

FILED

SEP 26 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZETIAN LIU,

Defendant.

NO.

4:19CR00794 SRC/NAB

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term
 - (a) “minor” to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));
 - (b) “sexually explicit conduct” to mean actual or simulated--
 - (i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,
 - (ii) bestiality,
 - (iii) masturbation,
 - (iv) sadistic or masochistic abuse, or
 - (v) lascivious exhibition of the anus, genitals or pubic area of any person (18 U.S.C. § 2256(2)(A));

(c) “computer” to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. § 2256(6));

(d) “child pornography” to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18

U.S.C. § 2256(8)).

2. The “Internet” was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about July 20, 2019, and on or about September 12, 2019, within the Eastern District of Missouri and elsewhere,

ZETIAN LIU,

the defendant herein, knowingly received to the Eastern District of Missouri using any means or facility of interstate and foreign commerce, graphic image files via the Internet which contained child pornography, including, but not limited to, the following:

- a. “精彩剪辑.mp4,” a graphic video file that depicts, in part, a prepubescent minor female engaged in sexual intercourse;
 - b. “媲美欣系列高清53.mp4,” a graphic video file that depicts, in part, a prepubescent minor female in a lascivious display of her genitals and engaged in sexual intercourse;
 - c. “媲美欣系列高清44.mp4,” a graphic video file that depicts, in part, a prepubescent minor female in a lascivious display of her genitals; and
 - d. “pthc hussyfan!!!NEWS (RARE) - mandy_sucking_cumshot.avi,” a graphic video that depicts, in part, a prepubescent minor female engaged in oral sex with a male;
- In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about July 20, 2019, and September 12, 2019, in the Eastern District of Missouri, and elsewhere,

ZETIAN LIU,

the Defendant herein, did knowingly possess material that contained an image of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, a Sandisk thumb drive, said thumb drive having been produced outside Missouri and therefore having traveled in interstate and foreign commerce, and said thumb drive contained child pornography, including but not limited to, the following:

- a. “YOY030 越南幼幼.mp4,” a graphic video file that depicts, in part, prepubescent minor females engaging in oral sex with a male;
 - b. “YOY028.MP4,” a graphic video file that depicts, in part, a minor female engaged in sexual intercourse with a male;
 - c. “YOY007A 幼交片段精.WMV,” a graphic video file that depicts, in part, males engaged in sexual intercourse with prepubescent minor females and minor females;
- In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

ROBERT F. LIVERGOOD
Assistant United States Attorney